

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Newport News Division

In re:
Carrielene Vanilla Pugh,

Case No. 12-50300-FJS
Chapter 13

Debtor.

**OBJECTION TO CONFIRMATION OF PLAN
AND NOTICE OF HEARING**

COMES NOW R. Clinton Stackhouse, Jr., Chapter 13 Trustee (the "Trustee"), who objects to confirmation of the plan filed in this case. In support of this objection, the Trustee states as follows:

1. Carrielene Vanilla Pugh (the "Debtor"), filed a voluntary petition for bankruptcy under Chapter 13 of Title 11 of the United States Code with this Court on February 28, 2012. Relief was ordered.

2. On February 29, 2012, the Trustee was appointed in this case and continues to serve in that capacity.

3. On March 13, 2012, the Debtor filed her original plan (the "Plan") which has not been confirmed by the Court.

4. At the section 341 hearing conducted on April 4, 2012, the Trustee requested verification of the Debtor's monthly mortgage payment amount to be provided within two (2) days. To date, the requested information has not been provided.

5. The Plan fails to meet the requirements set forth in 11 U.S.C. §1325.

For the foregoing reasons, the Trustee prays that confirmation of the Plan be denied.

R. Clinton Stackhouse, Jr. VSB No. 19358
Chapter 13 Trustee
870 Greenbrier Circle, Suite 200
Chesapeake, VA 23320
(757) 333-4000

NOTICE OF HEARING ON OBJECTION TO CONFIRMATION

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). If you do not want the Court to deny confirmation of your Plan or if you want the Court to consider your views on the Objection, then you and your attorney must:

ATTEND THE HEARING SCHEDULED TO BE HELD:

at U.S. Courthouse on May 11, 2012 at 9:30 a.m.
2400 West Avenue
Newport News, VA 23607

to consider and act upon the Objection to Confirmation of the Plan filed by the Chapter 13 Trustee.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an order granting that relief.

R. Clinton Stackhouse, Jr.
Chapter 13 Trustee

/s/ R. Clinton Stackhouse, Jr.

R. Clinton Stackhouse, Jr. VSB No. 19358
Chapter 13 Trustee
870 Greenbrier Circle, Suite 200
Chesapeake, VA 23320
(757) 333-4000

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of April 2012, I will electronically file the foregoing Objection with the Clerk using the CM/ECF system, which will then send electronic notification of such filing to John Russell Bollinger, Esquire, counsel for the Debtor and that a true copy was mailed, first-class, postage prepaid to the Debtor at:

Carrielene Vanilla Pugh
3955 Palomino Drive, Unit 204
Newport News, VA 23602

/s/ R. Clinton Stackhouse, Jr.

R. Clinton Stackhouse, Jr. VSB No. 19358
Chapter 13 Trustee
870 Greenbrier Circle, Suite 200
Chesapeake, VA 23320
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